

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No. 19-34574-KRH

Chapter 7

**PROPOSED AGENDA FOR HEARING ON
OCTOBER 19, 2021, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, United States Courthouse, 701 East Broad Street, Richmond, Virginia 23219, on October 19, 2021, beginning at 11:00 a.m. via Zoom:

Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJIsf-6qrzovHiJ1W7B-eUJQ9KiLth0YamQ>

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 101921

I. MATTERS IN ADVERSARY PROCEEDING NO. 20-03142 (UNITEDLEX CORPORATION et al).

1. Adversary Proceeding No. 20-03142 (UnitedLex Corporation et al) – Motion to Dismiss Adversary Proceeding / *Partially Dismiss the First Amended Complaint* (Re: related document(s) [86](#) Amended Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#) Proposed Order) (McKee, Thomas) [ECF No. 87]

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

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20 North Eighth Street, Second Floor
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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

Related documents:

- a. Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]
- b. Reply to Trustee's Omnibus Opposition Brief (Re: related document(s)[87](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (McKee, Thomas) [ECF No. 109]

Response Deadline: October 12, 2021

Responses Filed: Omnibus Opposition Brief *to the Motions to Dismiss the First Amended Complaint Filed by ULX Partners, LLC, ULX Manager, UnitedLex Corp., and Gary LeClair* (Re: related document(s)[87](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC, [104](#) Motion to Dismiss Pleading filed by Gary LeClair) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1) (Morabito, Erika) [ECF No 105]

Status: The Trustee will request that the Court deny the Defendants' Motion to Dismiss.

2. Adversary Proceeding No. 20-03142 (UnitedLex Corporation et al) – Motion to Dismiss Pleading (Re: related document(s)[86](#) Amended Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Andrew M. Bowman of Gentry Locke on behalf of Gary LeClair. (Bowman, Andrew) [ECF No. 104]

Related documents:

- a. Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

- b. Defendant's Reply to Trustee's Opposition Brief (Re: related document(s)[104] Motion to Dismiss Pleading filed by Gary LeClair) filed by Andrew M. Bowman of Gentry Locke on behalf of Gary LeClair. (Attachments: # (1) Exhibit(s) 1) (Bowman, Andrew) [ECF No. 108]

Response Deadline: October 12, 2021

Responses Filed: Omnibus Opposition Brief *to the Motions to Dismiss the First Amended Complaint Filed by ULX Partners, LLC, ULX Manager, UnitedLex Corp., and Gary LeClair*(Re: related document(s)[87](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC, [104](#) Motion to Dismiss Pleading filed by Gary LeClair) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1) (Morabito, Erika) [ECF No 105]

Status: The Trustee will request that the Court deny the Defendant's Motion to Dismiss.

II. MATTERS IN OTHER ADVERSARY PROCEEDINGS

3. Adversary Proceeding No. 21-03069 (Bowerman) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03069 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Richard W. Bowerman. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s)[5](#) Motion to Consolidate filed by Richard W. Bowerman) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Richard W. Bowerman. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s)[5](#) Motion to Consolidate filed by Richard W. Bowerman, [6](#) Motion to Expedite Hearing filed by Richard W. Bowerman) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Richard W. Bowerman. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03069. Complaint against Richard W. Bowerman filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) ECF No. 1]

- d. Adversary Proceeding No. 20-03142 (UnitedLex Corporation et. al.) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

4. Adversary Proceeding No. 21-03070 (Lange) - Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03070 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Christopher J. Lange. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Christopher J. Lange) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Christopher J. Lange. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Christopher J. Lange, [6](#) Motion to Expedite Hearing filed by Christopher J. Lange) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Christopher J. Lange. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]

- c. Adversary case 21-03070. Complaint against Christopher J. Lange filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline:

The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed:

None as of the filing of this agenda, but the Trustee intends on filing a response.

Status:

The Trustee will request that the Court deny the Motion.

- 5. Adversary Proceeding No. 21-03071(Zappia) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03071 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Andrew Zappia. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Andrew Zappia) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Andrew Zappia. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Andrew Zappia, [6](#) Motion to Expedite Hearing filed by Andrew Zappia) filed by

Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Andrew Zappia. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]

- c. Adversary case 21-03071. Complaint against Andrew Zappia filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

- 6. Adversary Proceeding No. 21-03078 (Burleigh) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03078 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Paul Burleigh. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Paul Burleigh) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Paul Burleigh. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Paul Burleigh, [6](#) Motion to Expedite Hearing filed by Paul Burleigh) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Paul Burleigh. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03078. Complaint against Paul Burleigh filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline:

The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed:

None as of the filing of this agenda, but the Trustee intends on filing a response.

Status:

The Trustee will request that the Court deny the Motion.

- 7. Adversary Proceeding No. 21-03079 (Cahill, Jr.) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03079 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of John H. Cahill, Jr.. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s)[5](#) Motion to Consolidate filed by John H. Cahill, Jr.) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of John H. Cahill, Jr.. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s)[5](#) Motion to Consolidate filed by John H. Cahill, Jr., [6](#) Motion to Expedite Hearing filed by John H. Cahill, Jr.) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of John H. Cahill, Jr.. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03079. Complaint against John H. Cahill, Jr. filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

8. Adversary Proceeding No. 21-03080 (Walker) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03080 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Karol Corbin Walker. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Karol Corbin Walker) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Karol Corbin Walker. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Karol Corbin Walker, [6](#) Motion to Expedite Hearing filed by Karol Corbin Walker) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Karol Corbin Walker. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03080. Complaint against Karol Corbin Walker filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline:

The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed:

None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

9. Adversary Proceeding No. 21-03081 (Dombroff) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03081 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Mark Dombroff. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Mark Dombroff) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Mark Dombroff. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Mark Dombroff, [6](#) Motion to Expedite Hearing filed by Mark Dombroff) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Mark Dombroff. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03081. Complaint against Mark Dombroff filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing.

Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

10. Adversary Proceeding No. 21-03082 (Ferland) – Motion to Consolidate Lead Case 20-03142 with 21-cv-03082 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Niclas Ferland. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Niclas Ferland) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Niclas Ferland. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Niclas Ferland, [6](#) Motion to Expedite Hearing filed by Niclas Ferland) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Niclas Ferland. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03082. Complaint against Niclas Ferland filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set

on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

11. Adversary Proceeding No. 21-03083 (Grubin) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03083 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Janice Grubin. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Janice Grubin) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Janice Grubin. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Janice Grubin, [6](#) Motion to Expedite Hearing filed by Janice Grubin) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Janice Grubin. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03083. Complaint against Janice Grubin filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has

misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

12. Adversary Proceeding No. 21-03087 (Thompson) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03087 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Lori Thompson. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Lori Thompson) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Lori Thompson. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Lori Thompson, [6](#) Motion to Expedite Hearing filed by Lori Thompson) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Lori Thompson. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03087. Complaint against Lori Thompson filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

13. Adversary Proceeding No. 21-03089 (Gustafson) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03089 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Charles Erik Gustafson. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Charles Erik Gustafson) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Charles Erik Gustafson. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Charles Erik Gustafson, [6](#) Motion to Expedite Hearing filed by Charles Erik Gustafson) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Charles Erik Gustafson. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03089. Complaint against Charles Erik Gustafson filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint

filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee.
(Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5)
(Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

14. Adversary Proceeding No. 21-03090 (Medley) – Motion to Consolidate Lead Case 20-cv-03142 with 21-cv-03090 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Jason Medley. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing (Related Document(s) [5](#) Motion to Consolidate filed by Jason Medley) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Jason Medley. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Jason Medley, [6](#) Motion to Expedite Hearing filed by Jason Medley) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Jason Medley. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]
- c. Adversary case 21-03090. Complaint against Jason Medley filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]

- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline: The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed: None as of the filing of this agenda, but the Trustee intends on filing a response.

Status: The Trustee will request that the Court deny the Motion.

15. Adversary Proceeding No. 21-03091 (Acee) – Motion to Consolidate Lead Case 20-cv-03142 with 21-03091 filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Elizabeth Acee. (Attachments: # [1](#) Proposed Order) (McGraw, Diana Lyn) [ECF No. 5]

Related documents:

- a. Motion to Expedite Hearing - *Motion to Consolidate Adversary Proceedings for Purposes of Joint Administration and for Related Relief* (Related Document(s) [5](#) Motion to Consolidate filed by Elizabeth Acee) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Elizabeth Acee. (McGraw, Diana Lyn) [ECF No. 6]
- b. Notice of Hearing (Re: related document(s) [5](#) Motion to Consolidate filed by Elizabeth Acee, [6](#) Motion to Expedite Hearing filed by Elizabeth Acee) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Elizabeth Acee. Hearing scheduled for 10/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McGraw, Diana Lyn) [ECF No. 7]

- c. Adversary case 21-03091. Complaint against Elizabeth Acee filed by Lynn L. Tavenner, as Chapter 7 Trustee. Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (02 (Other (e.g., other actions that would have been brought in state court if unrelated to bankruptcy))) Associated Bankruptcy Case Number: 3:19-bk-34574 (Nelson, Brittany) [ECF No. 1]
- d. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s) [1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]

Response Deadline:

The Movant unilaterally set a response deadline for 11:00 am on October 18, 2021. The Trustee maintains that the Movant has misapplied a local rule of this Court, which provides “A hearing may not be set by a party on less than 14 days’ notice unless the Court grants a motion requesting an expedited hearing pursuant to paragraph (N) of this Local Bankruptcy Rule. If a hearing is set on an expedited basis, the opposing party may file a response, with a supporting memorandum, not later than 1 day before the date of the hearing or as otherwise directed by the Court.” This Court has not yet granted the request for an expedited hearing. Nonetheless, the Trustee, through counsel, is working on a response which she intends to file on October 18, 2021.

Responses Filed:

None as of the filing of this agenda, but the Trustee intends on filing a response.

Status:

The Trustee will request that the Court deny the Motion.

III. REPORTS

16. Case Status and Report pursuant to Local Rule 2015-(a)-(1)(A)

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: October 17, 2021
Richmond, Virginia

By: /s/ Paula S. Beran
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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 17th day of October 2021, a true copy of the foregoing Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ Paula S. Beran
Counsel for Lynn L. Tavenner, Chapter 7 Trustee